



Representing Management Exclusively in Workplace Law and Related Litigation

Jackson Lewis LLP	ATLANTA, GA	LOS ANGELES, CA	PROVIDENCE, RI
58 South Service Road	BOSTON, MA	MIAMI, FL	RALEIGH-DURHAM, NC
Suite 410	CHICAGO, IL	MINNEAPOLIS, MN	SACRAMENTO, CA
Melville, New York 11747	CLEVELAND, OH	MORRISTOWN, NJ	SAN FRANCISCO, CA
Tel 631 247-0404	DALLAS, TX	NEW YORK, NY	SEATTLE, WA
Fax 631 247-0417	GREENVILLE, SC	ORANGE COUNTY, CA	STAMFORD, CT
www.JacksonLewis.com	HARTFORD, CT	ORLANDO, FL	WASHINGTON, DC REGION
	HOUSTON, TX	PITTSBURGH, PA	WHITE PLAINS, NY
	LONG ISLAND, NY	PORTLAND, OR	

May 31, 2007

FILED VIA ECF

Hon. William D. Wall
U.S. Magistrate Judge
U. S. District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722-4438

Re: Chambers, et al. v. SCO Family of Services
Index No.: 06-1275 (DRH) (WDW)

Dear Hon. Magistrate Judge Wall:

As counsel for Defendant, SCO Family of Services, we are writing to respond to Plaintiffs' request, as stated in counsel's letter dated May 29, 2007, for an extension of one month to produce Plaintiff, Chambers for deposition. Defendant opposes Plaintiffs' request for an extension of time to produce Chambers and seeks his dismissal as a named Plaintiff.

Contrary to Plaintiffs' counsel's representation, when he asked whether Defendant consented to his request, I responded we would present this issue to the Court to address this delay and Mr. Chambers' unavailability. At the time counsel for Plaintiff made his request for an extension of the discovery period, he did not disclose Plaintiffs' intent to file with District Judge Hurley a letter request for leave to file a motion for conditional class certification. Plaintiffs cannot reasonably expect Defendant to agree to a month-long extension of time to depose Plaintiff, Chambers, one of only two named Plaintiffs in this action, when Plaintiffs' simultaneously are requesting conditional class certification. Defendant's opposition to Plaintiffs' motion will be based, in part, on the deposition testimony of the two named Plaintiffs. Without Mr. Chambers' testimony, Defendant is severely hampered in opposing Plaintiffs' motion.

Hon. William D. Wall

May 31, 2007

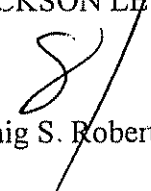
Page 2



For these reasons, Defendant respectfully requests that the Court deny Plaintiffs' request for an additional month in which to produce Mr. Chambers for his deposition and dismiss Plaintiff Chambers from this action.

Respectfully,

JACKSON LEWIS LLP



Craig S. Roberts

CSR:bc

cc: Fran L. Rudich, Esq. (via ECF)
Brian L. Bromberg, Esq. (via ECF)
Paul J. Siegel, Esq. (via ECF)